

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
DR. DAVID S. FIELD

Plaintiff,

vs.

EXPONENTIAL WEALTH INC.,
RYAN MURNANE, RYAN MICHAELS,
KRYSTALYNNE MURNANE, NOLAN
BENNETT, AND CHRISTOPHER PAUL

Defendants.
----- X

Index No. 1:21-cv-01990 (JGK) (SLC)

**ORDER TO SHOW CAUSE FOR
DEFAULT JUDGMENT AGAINST
DEFENDANT NOLAN BENNETT**

accompanying
Upon the annexed Declaration of Sara F. Lilling, Esq., dated January 3rd 2022, and the
~~exhibits annexed thereto~~, and upon all prior papers and proceedings heretofore had herein, it is

ORDERED, that Defendant Nolan Bennett show cause before this Court, located at 500
Pearl Street, New York, New York, on by January 19, 2022, ~~2022 at 9:30 o'clock in the forenoon~~
~~thereof, or as soon thereafter as counsel may be heard~~, why an Order should not be issued
pursuant to Rule 54 (b) and Rule 55(b) of the Federal Rules of Civil Procedure in favor of
Plaintiff Dr. David S. Field, for the following relief:

- i. Pursuant to FRCP Rule 55(b)(2), directing that a default judgment be entered in
favor of Plaintiff against Defendant Bennett in the amount of \$2,885,852 plus
interest; and it is further

ORDERED, that Defendant Bennett shall respond in writing to this Order to Show Cause
for a default judgment on or before January 19, 2022. If Defendant Bennett fails to respond
by that date, judgment may be entered against him and Defendant Bennett will have no trial.
Plaintiff may reply by January 26, 2022; and it is further

ORDERED, that service of a copy of this Order, along with the annexed Declaration of
(accompanying)
Sara F. Lilling, Esq. and the ~~exhibits annexed thereto~~, and the annexed Proposed Judgment upon

Defendant Bennett on his counsel of record, Crawford Bringslid Vander Neut, LLP, on or before

January 10, 2022, shall be deemed good and sufficient service thereof; it is further

ORDERED, that Plaintiff shall file proof of service of this Order to Show Cause on or before January 17, 2022.

J. G. Koeltl
JUDGE JOHN G. KOELTL
1/5/22 U.S.D.J.

No personal appearance in
response to this Order to Show Cause
is scheduled.

J. G. Koeltl
1/5/22 U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
DR. DAVID S. FIELD

Plaintiff,

Index No. 1:21-cv-01990 (JGK) (SLC)

vs.

EXPONENTIAL WEALTH INC.,
RYAN MURNANE, RYAN MICHAELS,
KRYSTALYNNE MURNANE, NOLAN
BENNETT, AND CHRISTOPHER PAUL

Defendants.
----- X

**PROPOSED DEFAULT
JUDGMENT AGAINST
DEFENDANT NOLAN BENNETT**

This matter having come before this Court on Plaintiff Dr. David S. Field's application for entry of a default judgment against Defendant Nolan Bennett ("Defendant Bennett"), under Rule 55(b)(2) of the Federal Rules of Civil Procedure; and after having considered Plaintiff's submissions, the Court finds as follows:

(1) A Certificate of Default was issued by the Clerk of the Court against Defendant Bennett on December 22, 2021;

(2) Defendant Bennett is not a minor, an incompetent person, or a member of the military service of the United States; and

(3) Defendant Bennet did not file an Answer or otherwise appear with the respect to the Amended Verified Complaint.

THEREFORE, IT IS ADJUDGED that Plaintiff shall have judgment over and against Defendant Bennet in the amount of \$2,885,852 plus interest, and that Plaintiff shall have execution therefor.

IT IS SO ORDERED this ____ day of _____, 2022

JUDGE JOHN G. KOELTL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. DAVID S. FIELD

Plaintiff,

vs.

EXPONENTIAL WEALTH INC.,
RYAN MURNANE, RYAN MICHAELS,
KRYSTALYNNE MURNANE, NOLAN
BENNETT, AND CHRISTOPHER PAUL

Defendants.

X

Index No. 1:21-cv-01990 (JGK) (SLC)

DECLARATION OF
SARA F. LILLING, ESQ.

X

SARA F. LILLING, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am an associate with the law firm of Mound Cotton Wollan & Greengrass, LLP, attorneys for Plaintiff Dr. David S. Field ("Plaintiff" or "Field"). As such, I am fully familiar with the facts and circumstances of this action.

2. I submit this Declaration in support of Plaintiff's order to show cause for default judgment against Defendant Nolan Bennett ("Bennett").

3. Plaintiff commenced this action by filing a Verified Complaint on March 8, 2021. A copy of the Verified Complaint (Doc. 1) is annexed hereto as Exhibit A. In this action, Plaintiff seeks damages against the defendants in the amount of \$2,885,852 plus interest. Id.

4. A Summons and a copy of the Verified Complaint were served on Defendant Bennett on March 25, 2021. A copy of the Affidavit of Service on Defendant Bennett (Doc. 17) is annexed hereto as Exhibit B.

5. On July 29, 2021, the law firm of Crawford Bringslid Vander Neut, LLP filed a Notice of Appearance on behalf of all defendants, including Defendant Bennett. A copy of the Notice of Appearance (Doc. 32) is annexed hereto as Exhibit C.

6. Thereafter, on October 15, 2021, Plaintiff filed an Amended Verified Complaint. A copy of the Amended Verified Complaint (Doc. 50) is annexed hereto as Exhibit D.

7. The Amended Verified Complaint was served on all of the initial defendants, including Bennett, via ECF on their counsel of record, Crawford Bringslid Vander Neut, LLP, on October 15, 2021. Id.

8. A Clerk's Certificate of Default was entered against Defendant Bennett on December 22, 2021. A copy of the Clerk's Certificate of Default against Defendant Bennet (Doc. 83) is annexed hereto as Exhibit E.

9. To date, Defendant Bennett has not filed an Answer or otherwise moved with respect to the Amended Verified Complaint, and his time to do so has expired.

10. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
January 3, 2022

/s/ Sara F. Lilling
SARA F. LILLING